Todd F. Silbergeld Director-Federal Regulatory



September 26, 1996

EX PARTE OR LATE FILED RECEIVED

#### EX PARTE

Mr. William F. Caton Acting Secretary Federal Communications Commission 1919 M Street, N.W., Room 222 Washington, D.C. 20554 CEDERAL COMMUNICA POMS COMMISSION

Re:

In the Matter of Federal-State Joint Board on Universal

Service, CC Docket No. 96-45

Dear Mr. Caton:

In accordance with the Commission's rules regarding ex parte presentations, please be advised that today, John Schrotenboer and Glen Sims, representing Southwestern Bell Telephone Company (SWBT), met with Commissioner Sharon Nelson and Lee Palagyi of the Washington Utilities and Transportation Commission. The purpose of the meeting was to discuss SWBT's stated positions in the above-referenced rule making docket.

Written materials, which were used during the presentation, are attached to this letter for inclusion into the official record in this docket. Pursuant to Section 1.1206(a)(1) of the Commission's rules, 47 C.F.R. Sec. 1.1206(a)(1), two copies of this letter and the supporting materials are provided for your use.

Due to the late hour at which the meeting concluded, we are filing this notification with you today. Should you have any questions concerning the foregoing, do not hesitate to contact me.

Sincerely,

Attachment

cc:

The Honorable Sharon Nelson (w/o attachment)

Ms. Lee Palagyi (w/o attachment)

Ms. Kathleen B. Levitz (w/ attachment)

Mr. John Stroman Morabito (w/ attachments), of Copies rec'd

Ms. Anna M. Gomez (w/ attachment)

LISTABCDE

## SOUTHWESTERN BELL TELEPHONE COMPANY

# COMPREHENSIVE FEDERAL AND STATE UNIVERSAL SERVICE PLAN

Washington Presentation Olympia September 25, 1996

### **INDEX**

- TAB 1 Definition of Universal Service.
- TAB 2 Why are we concerned?
  - The current basis of Universal Service support.
  - Carrier of last resort obligations remain.
  - Without change, further competitive entry risks ability to maintain Universal Service.
- TAB 3 Proxy cost quantification alternatives are inappropriate and unnecessary.
- TAB 4 SWBT's Comprehensive Federal/State Plan.
  - Jurisdictional responsibility.
  - Eligibility and qualification criteria.
  - Universal Service area.
  - Federal plan.
  - Intrastate plans.
- TAB 5 Other Issues.
  - Competitive bidding is inappropriate and harmful.

### **UNIVERSAL SERVICE DEFINITION**

Widely available basic telephone service at reasonable rates. This obligation requires the deployment of a telecommunications network for use by the general public to accomplish two-way switched voice communication within and beyond a local calling area. This universal service connectivity is provided by loop, switch and interoffice facilities and meets provider of last resort requirements. Basic services provided are:

- Voice grade access to the public switched network with the ability to place and receive calls (includes loop, local switching and local interoffice transport).
- Touch-tone.
- Single-party residential and business local service.
- Access to emergency services (911/E911).
- Access to basic operator services.
- Standard white page directory listing.
- Access to basic local directory assistance.

# FACILITIES WHICH CONNECT CUSTOMERS ARE THE BACKBONE OF UNIVERSAL SERVICE

- 1. The cost of the universally available network varies substantially geographically.
- 2. The sources of revenue to recover the network cost are:
  - Local exchange.
  - Support from toll, access and other services.
- 3. Carrier of last resort obligations remain with the incumbent LEC:
  - For existing customers.
  - Significant additional competition is not expected to be facilities-based, but through resale of service or unbundled facilities. The incumbent LEC still provides carrier of last resort facilities.
- 4. Without changes, further competitive entry, primarily in urban markets, will destroy the basis of support and put at risk the ability to maintain Universal Service.
  - New local entry is targeted primarily at urban areas.
  - FCC Interconnection Order effectively eliminates the ability to support the local exchange network with usage-based access revenues.

# SUMMARY OF ESTIMATED ACTUAL SUPPORT WHICH MAY BE LOST DUE TO FURTHER COMPETITION AND THE FCC INTERCONNECTION ORDER

### **Washington**

<u>Total</u> <u>Interstate</u> <u>State</u>

Support from other (primarily toll and access) services to maintain reasonable local rates.

\$375M Not Analyzed

2. Amounts within average toll rates to support reasonable rate levels in high cost areas.

**Not Analyzed** 

3. Amounts within average access rates to support reasonable rate levels in high cost areas.

**Not Analyzed** 

4. Support within local services

Business to ResidenceVertical Svcs to Basic Svcs

Not Analyzed Not Analyzed

		Washington				Estin	nated ***		
Study Area <u>Code</u>	Type Company	Study Area Name	Common Control Name	USF Loops (a)	Total Regulated <u>Costs</u> (b)	Local Exchange <u>Costs</u> (c)	Local Costs <u>Per Lp/Mo</u> (d=c/a/12)	Local Revenues ** <u>Per Lp/Mo</u> (e)	Support Per Lp/Mo (f=d-e)
522404	С	ASOTIN (WA)	TDS	1,033	1,052,618	804,393	64.89	44.86	20.03
522449	С	Contel Washington	GTE	69,509	63,3 <b>41,88</b> 5	45,317,023	54.33	37.32	17.01
522410	C	COWICHE		1,738	1,498,467	1,039,571	49.85	28.06	21.79
522412	С	Ellensburg Telephone Company	Eliensburg Telephone Comp	17,909	10,977,174	7,598,178	35.36	19.18	16.17
522416	С	GTE Washington	GTE	573,211	421,431,596	313,320,806	45.55	34.10	11.45
522417	С	HAT ISLAND TELEPHONE COMPANY		•					
522419	С	Hood Canal Telephone Co.	RJB Telecommunications Co	892	1,195,815	695,553	64.98	30.31	34.67
522423	С	INLAND	Western Elite Incorporated S	1,958	2,693,405	2,067,642	88,00	49.40	38.60
522426	С	KALAMA	Scatter Creek, Ltd.	•					
522427	С	LEWIS RIVER TELEPHONE COMPANY INC.		3,516	3,445,246	2,867,674	67.97	36.74	31.23
522431	С	Masheli Telephone	Mashell, Inc.	2,485	2,588,163	1,685,127	56.51	31.61	24.90
522430	A	MCDANIEL TELEPHONE COMPANY		•					
522437	С	PIONEER	Pioneer Telephone Holding	<b>79</b> 5	1,112,617	949,844	99.56	35.62	63.94
525161	С	PNB - Washington	U S WEST	2,080,641	1,262,411,913	894,554,330	35.83	26.56	9.27
522442	С	ST. JOHN		573	678,360	511, <b>43</b> 5	74.38	42.63	31.74
522446	С	TENINO	Scatter Creek, Ltd.	2,633	2,368,707	1,647,546	52.14	23.24	28.90
522447	С	Toledo Telephone Co.		1,594	1,673,690	995,788	52.06	26.75	25.31
522408	С	TU of Washington	Pacific Telecom	112,102	84,899,569	63,012,683	46.84	28.45	18.39
522400	С	United Tel. Co. of the Northwest-Washington	Sprint Corp.	64,271	43,116,778	31,611,875	40.99	24.86	16.13
522451	С	Western Wahkiakum County Telephone Company		918	1,688,516	1,456,833	132.25	72.49	59.76
522452	С	WHIDBEY TEL. CO.		•					
522453	С	Yelm Telephone	Comerco, inc.	8,391	5,373,286	4,249,654	42.20	16.63	25.57
		Total		2,944,169	\$1,911,547,805	\$1,374,385,955	\$38.90	\$28.30	\$10.60

Insufficient Information.
 Includes Federal USF support.
 Based on the following 1993 data sources: USF data, Joint Board Data Request, ARMIS data, Monitoring Report for Traffic Data (DEM), and REA Financial Data.

# ESTIMATED ACTUAL PACIFIC NORTHWEST BELL WASHINGTON COSTS DISTRIBUTED TO WIRE CENTERS USING BCM2 PROXY COSTS

· · · · · · · · · · · · · · · · · · ·	1	TOT	'AL		
	1				
	Proxy - BCM2	PACIFIC NORTHWEST BELL.  Washington ACTUAL  COSTS DISTRIBUTED			
	per Line,				
CLII	per Mo.	TO WIRE C			
	per mo.				
		per Line,	TOTAL COST		
		per Month	by Wire Center		
ABRDWA01S	\$28.14	\$35.84	\$8,391,284		
AUBNWA01H	\$26.64	\$33.94			
BCKLWA01S	\$40.42	\$51.49	\$2,803,424		
BDMDWA01R	\$43.23	\$55.07	\$4,782,607		
BLFRWA01S	\$48.58	\$61.89	\$3,393,874		
BLHMWA01H	\$25.67	\$32.69			
BLHMWALUR	\$56.82	\$72.37	\$897,764		
BLLVWAGLH	\$18.36	\$23.38	\$6,721,432		
BLLVWAGLR	\$19.17	\$24.42			
BLLVWASHR	\$24.30	\$30.95			
BMTNWA01H	\$24.90	\$31.71			
BNISWA01S	\$29.34	\$37.38	\$4,063,202		
BTLGWA01S	\$39.22	\$49.96	\$4,954,294		
CENLWA01S	\$29.33	\$37.36	\$6,060,091		
CHHLWA01H	\$29.70	\$37.83	\$2,954,038		
CLDMWA01S	\$40.97	\$52.18	\$1,402,480		
CLELWA01S	\$47.68	\$60.74	\$2,443,566		
CLFXWA01S	\$46.93	\$59.78	\$2,135,386		
CLVLWA01S	\$44.12	\$56.20			
COLBWA01S	\$33.55	\$42.74			
CRMTWA01S	\$141.88	\$180.74	<del></del>		
CRSBWA01S	\$53.99	\$68.77	4		
CSRKWA01S	\$46.13	\$58.76			
DESMWA01S	\$23.45	\$29.87			
DRPKWA01S	\$48.21	\$61.42			
DYTNWA01S	\$51.71	\$65.87			
ELK WA01S	\$64.14	\$81.71	· · · · · · · · · · · · · · · · · · ·		
ENMCWA01R	\$37.09	\$47.25			
EPHRWA01S	\$43.91	\$55.94			
ESTNWA01S	\$176.13	\$224.36			
FDWYWA01S	\$26.09	\$33.23			
GRBLWA01S	\$48.61	\$61.92			
GRHMWAGRS	\$32.31	\$41.15			
HDPTWA01R	\$152.03	\$193.66			
ISQHWAEXS	\$152.03	\$35.17			
JOYCWA01S	\$72.08		<del></del>		
KENTWA01S	\$72.06 \$21.95	\$91.82 \$27.96			
KENTWAMES		\$27.96 \$27.54			
KENTWAMES	\$29.47	\$37.54 \$36.60			
	\$20.88	\$26.60			
LACYWA01S	\$28.84	\$36.74			
LBLKWA01S	\$39.02	\$49.70	\$2,870,094		

# ESTIMATED ACTUAL PACIFIC NORTHWEST BELL WASHINGTON COSTS DISTRIBUTED TO WIRE CENTERS USING BCM2 PROXY COSTS

	1	тот	ΔΙ		
	1	PACIFIC NORTHWEST BELL Washington ACTUAL COSTS DISTRIBUTED TO WIRE CENTERS *			
	Proxy - BCM2				
	per Line,				
CLLI	per Mo.				
APPI	Det MO.	per Line,	TOTAL COST		
		per Month	by Wire Center		
LGVWWA02R	\$25.56	\$32.56	\$16,994,548		
LNLKWA01S	\$71.91	\$91.60	\$1,293,741		
MPVYWAMVS	\$34.02	\$43.33	\$6,973,152		
MRISWA01S	\$25.30	\$32.22	\$6,274,229		
MSLKWA01S	\$27.61	\$35.17	\$5,186,273		
MSLKWAABS	\$43.46	\$55.36	\$2,150,383		
NPRTWA01S	\$89.82	\$114.41	\$1,213,330		
NPVNWA01S	\$49.13	\$62.58	\$2,336,000		
NWLKWA01S	\$38.75	\$49.36	\$2,881,762		
OCSHWA01S	\$65.76	\$83.77	\$814,647		
OLYMWA02H	\$25.32	\$32.26	\$15,891,030		
OLYMWAEVR	\$36.74	\$46.80	\$4,224,683		
OMAKWA01S	\$48.29	\$61.51	\$5,016,842		
ORCHWA01S	\$28.04	\$35.71	\$22,243,159		
ORVLWA01S	\$66.18	\$84.31	\$2,542,993		
OTHEWA01S	\$38.04	\$48.46	\$3,236,982		
PASCWA01S	\$27.40	\$34.91	\$6,174,072		
PMRYWA01S	\$66.14	\$84.25	\$1,448,237		
PTANWA01S	\$29.40	\$37.46	\$7,883,260		
PTLWWA01S	\$69.69	\$88.77	\$1,766,547		
PTORWAFES	\$27.88	\$35.51	\$4,956,428		
PTRSWA01S	\$95.51	\$121.67	\$1,276,561		
PTTWWA01S	\$30.86	\$39.31	\$3,388,740		
PYLPWA01R	\$26.46	\$33.70	\$12,516,356		
RDFDWA01S	\$43.48	\$55.38			
RNTNWA01R	\$26.01	\$33.13	\$30,668,035		
ROCHWA01S	\$48.92	\$62.32			
ROY WA01S	\$56.01	\$71.34	\$842,579		
SEQMWA01H	\$34.04	\$43.36	\$5,242,955		
SHTNWA01H	\$35.32	\$45.00			
SLDLWASIH	\$27.58	\$35.13			
SMNRWA01H	\$29.43	\$37.49			
SNYSWA01R	\$38.51	\$49.06			
SPDLWA01S	\$85.99	\$109.53			
SPKNWA01H	\$19.59	\$24.96	,		
SPKNWACHR	\$37.05	\$47.20			
SPKNWAFAH	\$25.07	\$31.93			
SPKNWAHDR	\$24.54	\$31.27			
SPKNWAKYR	\$23.01	\$29.31			
SPKNWAMOR	\$31.26	\$39.82			
SPKNWAWAR	\$26.40	\$33.62			
SPKNWAWHS	\$27.85	\$35.47			

# ESTIMATED ACTUAL PACIFIC NORTHWEST BELL WASHINGTON COSTS DISTRIBUTED TO WIRE CENTERS USING BCM2 PROXY COSTS

		TOTAL			
1 I		PACIFIC NORT	THWEST BELL on ACTUAL		
1	Proxy - BCM2	Washington	ACTUAL		
1	per Line,	COSTS DIS			
CLLI	per Mo.	TO WIRE C			
		per Line,	TOTAL COST		
		per Month	by Wire Center		
STTLWA03R	\$19.47	\$24.80	\$16,901,152		
STTLWA04R	\$24.85	\$31.65	\$20,318,201		
STTLWA05R	\$21.88	\$27.87	\$16,555,119		
STTLWA06H	\$15.49	\$19.73	\$18,006,643		
STTLWACAS	\$19.64	\$25.02	\$11,883,578		
STTLWACHR	\$24.83	\$31.62	\$19,423,059		
STTLWADUR	\$22.82	\$29.07	\$14,139,726		
STTLWAELH	\$15.06	<b>\$</b> 19.18	\$6,052,403		
STTLWALAS	\$24.61	\$31.35	\$16,861,613		
STTLWAPAS	\$22.04	\$28.08	\$14,573,318		
STTLWASUS	\$23.79	\$30.30	\$19,681,514		
STTLWAWER	\$24.69	\$31.45	\$14,644,528		
TACMWAFAR	\$19.61	\$24.97	\$12,668,632		
TACMWAFLS	<b>\$41.12</b>	\$52.38	\$4,573,054		
TACMWAGFH	\$24.12	\$30.72	\$16,297,124		
TACMWAJUS	\$26.59	\$33.87	\$16,072,355		
TACMWALER	\$27.02	\$34.41	\$6,665,123		
TACMWALES	<b>\$28.19</b>	\$35.91	\$8,666,750		
TACMWALOS	\$25.07	\$31.93	\$10,998,488		
TACMWASYS	\$24.16	\$30.78	\$9,208,392		
TACMWAWAS	\$26.10	\$33.24	\$6,000,396		
TACMWAWVH	\$25.40	\$32.36	\$13,161,557		
VANCWA01H	\$24.06	\$30.64	\$14,855,842		
VANCWANOS	<b>\$28.5</b> 3	\$36.34	\$9,859,613		
WLWLWA01H	\$28.27	\$36.01	\$11,749,641		
WNLCWA01S	\$46.61	\$59.38	\$735,942		
WRDNWA01S	<b>\$</b> 67.11	\$85.49			
WTBGWA01S	\$56.70	\$72.23			
YAKMWA02S	\$25.06	\$31.92			
YAKMWAWES	\$31.11	\$39.63			
AVERAGE	\$26.16	\$33.33	<del></del>		

Ratio - Actual to BCM2 Costs

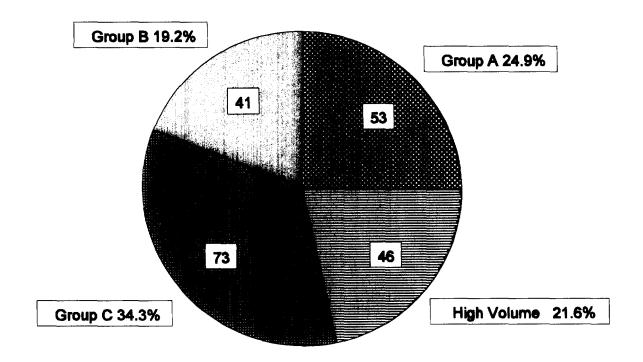
127%

<sup>\*</sup> Proxy cost times ratio of Average Actual to Average BCM2

# Summary of Estimated Actual Support Which May Be Lost due to Further Competition and THE FCC Interconnection Order

		<u>Nationwide</u>			Southwestern Bell		
		Total	Interstate	<u>State</u>	Total	Interstate	State
1.	Support from other (primarily toll and access) services to maintain reasonable local rates.	\$18.1B	Not Analy	/zed	\$1,536M	\$315M \$	51,221 <b>M</b>
2.	Amounts within average toll rates to support reasonable rate levels in high cost areas.	ı	Not Analyzed	i	\$143M	<b>\$</b> 0	\$143M
3.	Amounts within average access rates to support reasonable rate levels in high cost areas.	i	Not Analyzed	i	\$345M	\$215M	\$130M
4.	Support within local services - Business to Residence - Vertical Svcs to Basic Svcs		Not Analyzed Not Analyzed		N \$914 <b>M</b>	lot Analyze \$0	ed \$914M

# SWBT - Missouri Service Areas 213 End Office Wire Centers



Low Volume - Group A - Under 1,000 Lines

- Group B - Under 2,500, Over 1,000 Lines

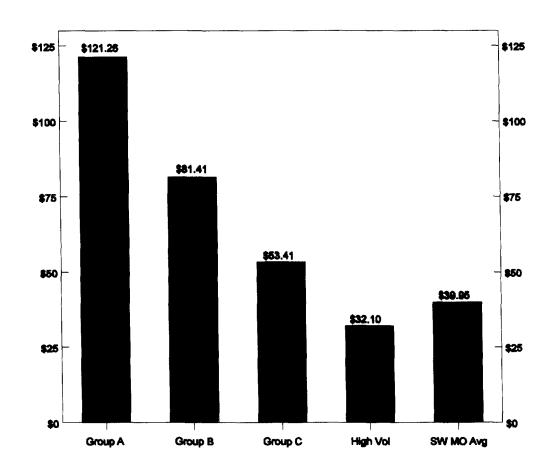
- Group C - Over 2,500 Lines

High Volume (HV) - Over 50M Toll and Access MOU

The majority of areas (wire centers) that SWBT serves are low volume, primarily mid-size and small towns and rural areas.

**SWBT - Missouri** 

### Geographic Costs To Provide Local Exchange Network



#### WIRE CENTER GROUPS

ĺ	Low Volume				Total/	
Ť	Group A	Group B	Group C	H <b>i</b> gh Vol	Average	
Number of Wire Centers	53	41	73	46	213	
Households per sq mile	8	14	40	436	75	
Toll/Access MOU	2%	3%	22%	73%	100%	

NOTE: An updated 1995 Study Area Cost Study average cost per access line is \$38.76.

# GEOGRAPHIC COSTS TO PROVIDE LOCAL EXCHANGE NETWORK

- Actual costs to serve vary substantially by geographic area.
- It is more costly to serve low density (largely rural) areas than high density, high volume (largely metro) areas.
- A substantial share of total local exchange costs (\$989M) are devoted to providing service in non-urban areas (\$415M, or 42%).
- Carrier of Last Resort obligations, in particular maintaining capacity needed to serve any reasonable service request have contributed substantially to network costs.
- Highest usage volumes are concentrated in metro areas - 73% in high volume areas.

# **SWBT ACTUAL COSTS ARE REASONABLE**

- SWBT has efficiently deployed investments to provide quality service to both urban and rural customers over many years.
- SWBT's deployment of infrastructure is devoted to upgrading the basic network for residence and business customers.
- The following assertions are wrong and without basis in fact:
  - (a) SWBT has systematically over-invested.
  - (b) SWBT has made poor historical investment decisions.
  - (c) SWBT is deploying its new plant for competitive services, interLATA or video services.
  - (d) SWBT's expenses and investments are overstated due to inefficiencies.
- AT&T and others often make these incorrect assertions, without facts, to support why their proxy models, such as TSLRIC, have investment and expense levels that are approximately 45% less than actual costs.

#### LOCAL EXCHANGE NETWORK ARE REASONABLE SWBT - Missouri 1995

	SWBT	SWBT COST %
1		
Int A P - IDM - L A	1	
Direct Facility Invest. 2 COE	1,099,034,095	
3 C&WF	1,623,530,880	
4 IOT	75,039,189	
5 Operator Systems	10,938,195	
6 TOTAL DIRECT FACILTY INVESTMENT	2,808,542,359	
7 COE Reserves	414,319,730	
8 C&WF Reserves 9 IOT Reserves	691,113,305	
10 Oper Sys Reserves	41,755,355 3,818,139	
11 COE Deferred Taxes	179,633,813	
12 C&WF Deferred Taxes	126,187,549	
13 IOT Deferred Taxes	9,255,719	
14 Oper Sys Deferred Taxes	1,708,367	
15 TOTAL DIRECT FACILTY RESERVES	1,467,791,976	
16 Net Investment	1,340,750,383	
17 Direct Return and Tax	218,646,859	20,59%
Direct Facility Exp.	ו	
18 COE Maint.	51,501,660	
19 C&WF Maint.	100,644,722	
20 IOT Maint.	24,167,753	
21 OS Maint.	840,582	
22 COE Depreciation	96,900,455	
23 C&WF Depreciation 24 IOT Depreciation	81,031,311	
25 OS Depreciation	5,770,891 776,697	
26 Network Operations	81,414,395	
27 Property Tax	55,609,139	
28 Total Direct Expense	498,657,606	46.96%
29Total Direct Cost	717.304.464	67.55%
Za loua Direct Cost	717,304,404	07.0076
Customer Service Related Expenses		•
30 Customer Service Exp. (1)	58,728,954	
31 Operator Services (1)	24,698,115	ļ
32 Total Customer Services Expenses	83,427,069	7.86%
Network and Service Support Investments		,
33 Gen. Sup. Fac. Inv.	857,523,913	
34 Oth, Investment	56,278,361	
35 Gen. SupDef. Taxes 36 GSF Reserves	100,090,798 255,234,136	
37 Other Reserves	5,938,786	
38 Net Investment	552,538,555	
39 Support Investment Return and Tax	90,108,844	8.49%
Network and Service Support Expenses		<b>a</b>
40 Depreciation (GSF)	50,842,095	<b>-</b>
41 Amortization	4,785,315	
42 GSF Expenses 43 Other	(17,567,984 3,091,945	
44 Other Taxes	11,816,425	-
45 Total Support Expenses	<b>\$2,967,79</b> 6	4.99%
Common Costs		_
46 Marketing	23,279,585	
47 Corporate	94,745,819	<u> </u>
48 Total Common Costs	118,025,404	11.12%
49 Total Costs	1,061,831,577	100.00%

# REASONABLE RATES

Irrespective of geographic local exchange cost differences, the current "reasonable" rates for all are supported to a large degree by either explicit support or support flows implicit in the current rate structure. This support:

• Maintains existing SWBT local rate levels - Low: \$7.55

- High: \$12.50

 Maintains existing geographic (urban vs. rural) rates via statewide intraLATA toll and interLATA access rate averaging.

Major supports are composed of:

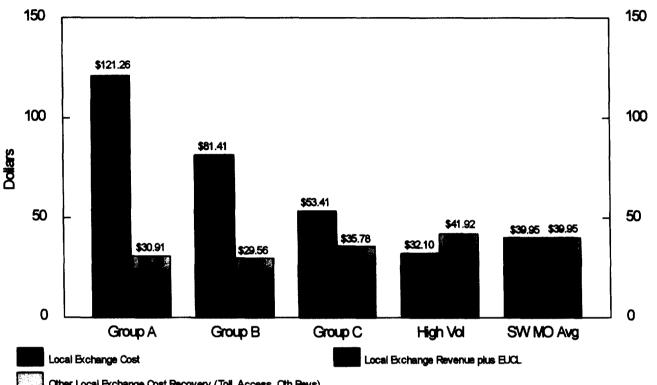
(1) Implicit - Recovery of local costs from toll, access and other customers.

Missouri	Avg Rev / MOU	Avg Loc Exch Support
Toli	\$ 0.19	\$ 0.09
State Access	\$ 0.11	\$ 0.07

- (2) Explicit Federal USF
  - Interstate switch recovery
  - Interstate Long Term Support
  - State support funds
  - Lifeline/Linkup

### **SWBT - Missouri**

#### Local Exchange Costs\* and Local Exchange Cost Recovery **Per Line Per Month**



Other Local Exchange Cost Recovery (Toil, Access, Oth Revs)

#### WIRE CENTER GROUPS

	Low Volume				Total/	
Ī	Group A	Group B	Group C	High Vol	Average	
Number of Wire Centers	53	41	73	46	213	
Households per sq mile	8	14	40	436	75	
Toll/Access MOU	2%	3%	22%	73%	100%	

Low Volume - Group A - Under 1,000 Lines

- Group B - Under 2,500, Over 1,000 Lines

- Group C - Over 2,500 Lines

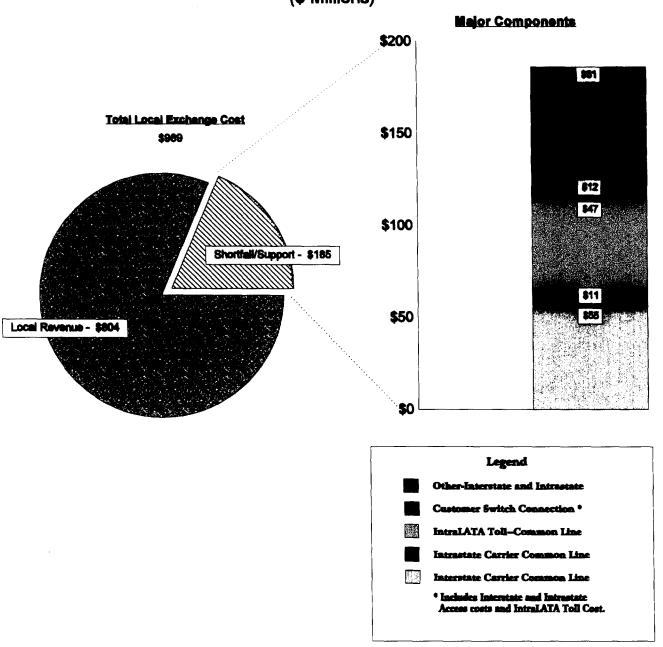
High Volume (HV) - Over 50M Toll and Access MOU

NOTE: An updated 1995 Study Area Cost Study shows Local Exchange cost as \$38.76.

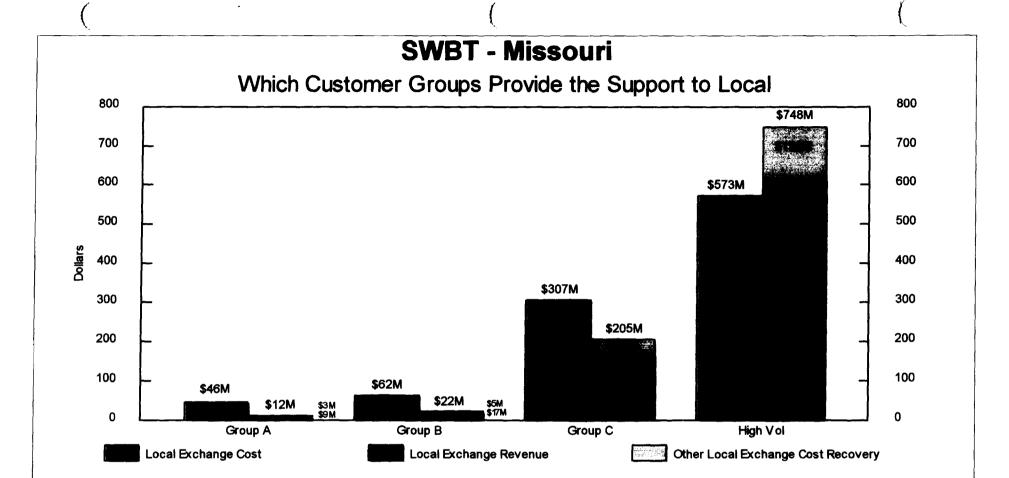
<sup>\*</sup> Embedded Fully Distributed Cost Analysis

### SWBT - Missouri

#### Analysis of Major Components of Support To Local Exchange Service (\$ Millions)



NOTE: An updated 1995 study indicates that this support is now \$205M



Analysis of Support Used and Generated to Recover

				Net
	Support Ge	nerated	Support	Geo graphic
	Toll/A∞/Oth	Local	Used	Sup port
High Volume	\$136M	\$40M	\$0	\$176
Group A-C	\$49M	\$0	\$225 M	(\$176 <b>M</b> )
Total	\$185M	\$40M	\$225 M	\$0

# SUMMARY MISSOURI LOCAL EXCHANGE SUPPORT

- Total toll, access and other support to maintain existing local exchange rates in Missouri is \$185M.
- In addition, \$40M of suppport for SWBT's rural network in Missouri is provided by urban local exchange customers.
- Local exchange revenues are lower than local exchange costs in most areas of the state.
- In non-urban areas local exchange revenues plus support generated by toll and access customers in those areas does not recover local exchange costs - \$176M short.
- The \$176M shortfall is generated by toll, access and local customers in urban high volume areas.

#### **SWBT--MISSOURI**

### **SUMMARY OF SUPPORT AMOUNTS PER LINE**

			Local						
	Switched	Local Cost	Revenue	Local	IS CCL	ST CCL	Toll/Other	Support	
Exchange #	Lines	/Ln/Mo	/Ln/Mo	Support Req	Rev/Ln/Mo	Rev/Ln/Mo	Support	Generated	Net Support
	а	b	С	d = b - c	е	f	g	h = e + f + g	i = d + h
_ 1	211	294.41	45.22	(249.19)	7.27	2.10	8.37	17.74	(231.45
2	452	249.01	21.15			1.81	2.45		(221.96
3	422	226.16	21.35		1.13	0.83	1.39	3.35	(201.47
4	801	195.93	22.84	(173.09)		1.55	2.05	4.92	(168.17
5	306	179.93	22.39	(157.54)		1.42	2.24	5.07	(152.47
6	131	175.51	24.41	(151.10)		0.84	1.55	3.64	(147.46
7	1,180	169.12	19.68	(149.43)	1.20	0.81	1.35	3.35	(146.08
8	676	170.59	22.57	(148.03)	1.12	0.49	1.28	2.89	(145.13
9	525	171.85	24.12	(147.73)	1.31	0.58	1.50	3.39	(144.33
10	625	182.19	37.48	(144.70)		2.03	4.13	9.42	(135.29
11	497	155.03	18.66	(136.37)	0.97	0.81	1.10	2.88	(133.49
12	572	156.09	20.71	(135.38)	1.27	0.86	1.64	3.78	(131.60
13	525	152.37	21.55	(130.83)	1.09	0.71	1.24	3.04	(127.78)
14	699	154.85	24.42	(130.44)	1.62	1.84	2.50	5.97	(124.47
15	744	150.44	24.06	(126.38)	1.80	0.81	2.11	4.72	(121.66)
16	875	140.78	21.01	(119.77)	0.94	0.58	1.11	2.62	(117.14)
17	398	137.35	18.36	(118.99)	1.56	0.59	1.80	3.94	(115.04)
18	550	139.08	20.25	(118.83)	0.82	1.81	1.65	4.28	(114.55)
19	564	137.41	21.73	(115.68)	1.28	1.52	2.15	4.96	(110.72)
20	318	135.93	22.26	(113.68)	1.12	0.70	1.29	3.11	(110.57)
21	1,084	132.12	18.62	(113.49)	1.13	0.85	1.35	3.33	(110.16)
22	345	135.61	23.20	(112.40)	1.83	0.45	2.02	4.30	(108.11)
23	1,904	126.89	16.80	(110.08)	1.05	1.11	1.53	3.68	(106.40)
24	764	139.83	35.90	(103.93)	0.76	0.31	0.90	1.97	(101.96)
25	535	137.90	35.05	(102.85)	1.11	0.46	1.25	2.82	(100.02)
26	745	130.29	29.60	(100.69)	1.42	0.74	1.81	3.98	(96.71)
27	1,211	119.89	20.17	(99.73)	1.29	0.99	1.64	3.93	(95.80)